



CITY OF *Lethbridge*

Office of the City Clerk

March 10, 2026

RE: NOTICE OF HEARING - SUBDIVISION AND DEVELOPMENT APPEAL BOARD

An appeal has been filed against the Decision of the Development Authority to Refuse Development Permit DEV 16503, being an application to develop single-detached dwelling and secondary suite at 3 MT Sundial Bay W.

When an appeal is filed with the Subdivision and Development Appeal Board (SDAB), all persons who own property within 60 metres of the development are notified of the hearing by way of this letter. In addition, the owner of the property will also receive a copy of this letter.

The Subdivision and Development Appeal Board (SDAB) will hold a Public Hearing as follows:

DATE:	Thursday, March 19, 2026
TIME:	5:00 p.m.
LOCATION:	Council Chambers, Main Floor, City Hall 910 – 4 Avenue South

Persons affected by this development have the right to present a written, verbal and/or visual submission to the Board. When making a presentation, keep in mind that in accordance with the legislation that governs the SDAB, the Board can only consider relevant planning matters when rendering its decision. It is recommended that you limit your presentation to five minutes.

If you wish to submit written material to the Board, it should be delivered to the Secretary of the SDAB via email at sdab@lethbridge.ca, including your full name and mailing address no later than 12:00 noon on the Wednesday prior to the hearing. If you are unable to meet this submission deadline, please bring 12 copies of the materials to the Hearing and it will be distributed at the start of the Hearing. Any written and/or visual material received will be made available to the public.

We will be pleased to answer any questions you may have regarding the appeal and can also provide information or advice on Board procedures and how to make presentations to the Board. Please feel free to contact me at 403 320 3030 if you have any questions.

Yours truly,

Hailey Winder
Board Clerk,
Subdivision and Development Appeal Board



CITY OF Lethbridge

NOTICE OF APPEAL

Subdivision & Development Appeal Board

In accordance with sections 678 and 686 of the *Municipal Government Act* and The City of Lethbridge Bylaw 4749, an appeal to the Subdivision and Development Board must be filed within the legislated time frame.

Site Information		(Date Received Stamp)
Municipal Address of Appeal 3 MT SUNDIAL BAY W		RECEIVED MAR 10 2026
Legal Description of Site (must be completed for subdivision appeals)		
Development Application Number or Subdivision Application Number Development Application Number: DEV16503		
Appellant Information		
Name SPS Construction Ltd		(Office use Only)
Mailing Address 380 Centre creek Ct S		
City Lethbridge	Province AB	Postal Code T1K 8L2
Residence #	Business # 403-382-0392	Email pasquetti SP@shaw.ca

APPEAL AGAINST (Check One Box Only) for multiple appeals you must submit another Notice of Appeal

Development Permit	Subdivision Permit	Notice of Order
<input type="checkbox"/> Approval	<input type="checkbox"/> Approval	<input type="checkbox"/> Notice of Order
<input type="checkbox"/> Conditions of Approval	<input type="checkbox"/> Conditions of Approval	
<input checked="" type="checkbox"/> Refusal	<input type="checkbox"/> Refusal	

REASONS FOR APPEAL Sections 678 and 686 of the *Municipal Government Act* require that the written Notice of Appeal must contain specific reasons for the appeal.

The grounds for this appeal are as follows:

With reference to the REASONS FOR REFUSAL:

- The Sunridge Outline Plans is therefore demonstrated not to be a binding bylaw
- The alleged "negative impact" is not substantiated, and there is evidence to the contrary

ALL DETAILS ARE PROVIDED IN THE ATTACHED PAGE

(Attach a separate page if required)

This Personal information is collected under the authority of the Freedom of Information and protection of Privacy Act. Section 33(c) and the Municipal Government Act, Sections 6788 and 685 ~~Note: this information will be a part of a file available to the public~~, if you have any questions regarding the collection of this information, contact the FOIP Coordinator at (403) 329-7829.

Signature of Appellant 		Date YYYY MM DD 2026 03 09
FOR OFFICE USE ONLY		
Final Date of Appeal YYYY MM DD	Appeal Number	Hearing Date YYYY MM DD
		Date Appellant Notified YYYY MM DD

APPEAL SUBMISSION INFORMATION

The Notice of Appeal must be received by the Subdivision and Development Appeal Board, no later than the final date for appeal, as specified in the *Municipal Government Act*. Otherwise, the appeal will not be processed.

FILING INFORMATION

If you mail the Appeal, it must be received on or before the final date for appeal or it will not be processed and a hearing before the Board will not occur.

MAIL TO:	DELIVER TO:
The Secretary Subdivision & Development Appeal Board City Hall 910 - 4 th Avenue South Lethbridge, Alberta T1J 0P6	The Secretary Subdivision & Development Appeal Board Office of the City Clerk, 2 nd Floor, City Hall 910 - 4 th Avenue South Lethbridge, Alberta

APPEAL PROCESS

a) DEVELOPMENT APPEALS

Any decision of the Municipal Planning Commission or Development Officer can be appealed. Letters of Appeal are made to the Subdivision & Development Board and must be made within 21 days of receipt of the written decision, after

- 1) The date that the notice to the public is published in the newspaper; or
- 2) In the case of an appeal by an applicant, the date that the notice to the applicant is deemed to have been received.

All landowners within 60m (200 feet) of the parcel are notified in writing of the Appeal.

b) SUBDIVISION APPEALS

A decision of the Municipal Planning Commission or Subdivision Officer can be appealed. Letters of Appeal are made to the subdivision & Development Board and must be made within 21 days of receipt of the written decision. An Appeal can only be initiated by:

- 1) the applicant
- 2) a Provincial Government department if the application is required to be referred to that department
- 3) school authority with respect to
 - a. the allocation of municipal reserve and school reserve or money in place of the reserve,
 - b. the location of school reserve allocated to it, or
 - c. the amount of school reserve or money in place of the reserve.

Appeals within a certain distance of the highway, a body of water, or a sewage treatment, or waste management facility are handled by the Provincial Municipal Government, as set out in the provincial subdivision and development regulations.

If you require further information regarding Appeal deadlines and Board procedures, please contact the Appeal Board Office at:

Phone: 403 329 7329

Email: david.sarsfield@lethbridge.ca

Website: www.lethbridge.ca

Attachment: THE GROUNDS FOR THE APPEAL

1. Preliminary Remarks

The Sunridge Outline Plan seems not to be a bylaw. The refusal states: “*Sunridge Outline Plan allowed for 710 dwelling units. Existing units in the subdivision is now 818 [...]*”. Therefore, the Outline Plan is not a bylaw. Its provisions serve as planning guidelines rather than strict regulatory limits. If they were binding caps, the additional 108 dwelling units would not have been approved.

Need for consistency. Since the City has already authorized numerous units beyond the Outline Plan projection, it is reasonable to expect consistency and uniformity in the evaluation of this application. The discretionary nature of a “Secondary Suite, New” cannot result in arbitrary determination. It’s assumed that any alleged grounds for refusal are supported by specific and objective findings, and that such grounds are demonstrably absent in the previously approved units.

“Negative impact” should be assessed against the permitted use. The refusal states: “*One additional unit will have a negative impact on the area.*”. The Single Detached Dwelling is permitted, thus the relevant comparison shall not be between “*one [generic] additional unit*” against an empty lot, but rather between an average Single Detached Dwelling (which would be permitted in any case), and the specific Dwelling proposed.

As a matter of fact, the project was intentionally designed to replicate the architectural and functional impact of a typical Single Detached Dwelling.

2. Analysis of the Alleged Impacts

The statement that “*One additional unit will have a negative impact on the area*” appears general and unsupported by technical evidence. On the contrary:

Impact on residential density. None. The house is only a four-bedrooms house. Designed to accommodate a number of occupants comparable to that of a standard single detached dwelling: Main: 3 persons max (couple + child); Basement: 2 persons max. Total: 5 persons max. This is fully consistent with the typical occupancy of a single-family home (4 persons). **Anyway, the owner is willing to formalize a letter of intent confirming the responsible and non-intensive use of the suite.**

Impact on the sewer infrastructure. None. The project includes three bathrooms, exactly as would a single detached dwelling of comparable size. The load on the municipal system should be therefore identical.

Impact on traffic and on-street congestion. The project provides four off-road parking spaces (two in the double garage, two on the large main driveway). This represents one parking stall per bedroom, more than sufficient to ensure proper off-street parking. **Anyway, as this is a corner lot, the owner is willing to add an additional single driveway along the long side of the property, should it be necessary to eliminate any possible concern.**

Architectural impact. None. The project fully complies with the approved Architectural Controls. Furthermore, the house has been intentionally designed not to be an “investment/cookie-cutter house”. The extended curved front veranda, the articulated housefront with different depths and lines, the quality materials and finishes are to enhance, not diminish, the aesthetic value of the neighborhood.

Noise impact. The design includes dedicated acoustic insulation between the main floor and the basement, as indicated in the submitted drawings. Living areas are intentionally proportioned to discourage gatherings and preserve quiet enjoyment.

This suited house is modest in size, high in quality, and designed specifically to accommodate high-end occupants: stable, respectful, and limited in number.

Address: **3 MT SUNDIAL BAY W**
Legal: 1012954;11;35

District: R-L

Applicant: 5P'S CONSTRUCTION
Address: 380 COULEE CREEK CRT S LETHBRIDGE AB T1K 8C2

Phone: 403 382 0392

Development Proposed To construct a new Single Detached Dwelling with Secondary Suite.

District R-L LOW DENSITY RESIDENTIAL

Land Use DWELLING, SINGLE DETACHED - PERMITTED
SECONDARY SUITE, NEW - DISCRETIONARY

REASONS FOR REFUSAL

1. The existing community of Sunridge is not in keeping with the density calculations of the Outline Plan. One additional unit will have a negative impact on the area which is already over density.

INFORMATIVE:

Sunridge Outline Plan allowed for 710 dwelling units. Existing units in the subdivision is now 818, therefore Sunridge has 108 more dwelling units than originally planned for in the Outline Plan.

Decision Date

Feb 18, 2026

**Development.
Authority**

Leda K. Tittsworth

LEDA KOZAK TITTSWORTH

STATUTORY PLANS

The SSRP and applicable municipal statutory plans were considered in rendering this decision.

COMPLIANCE WITH OTHER LAWS AND AGREEMENTS

The City of Lethbridge assesses applications according to the development requirements and standards of the Land Use Bylaw in force at the time of application. This Development Permit does not relieve the owner, the applicant, or the owner's authorized agent from full compliance with (i) the terms and conditions of any easement, covenant, building scheme or other agreement affecting the property, or (ii) the requirements of any other applicable laws and regulations.

APPEALS

The applicant has the right to appeal this decision to the Subdivision and Development Appeal Board. An appeal shall contain a statement of the grounds of appeal and shall be delivered either personally or by Registered Mail so as to reach the Secretary of the Subdivision and Development Appeal Board not later than twenty-one (21) days after the decision date indicated on the Development Permit or 'Development Permit Application - Refused' letter.

Permits which were the subject of a license, permit, approval or other authorization granted by the Natural Resources Conservation Board, Energy Resources Conservation Board, Alberta Energy Regulator, Alberta Energy and Utilities Board, Alberta Utilities Commission, or by the Minister of Environment and Parks must be appealed through the Land and Property Rights Tribunal.

Privacy Notice

The personal information collected for a construction permit application is authorized by sections 4(a) and 4(c) of the Protection of Privacy Act, and the Alberta Safety Codes Act. This information is necessary to process the construction permit application, issue permit(s), and facilitate legislated compliance monitoring & verification. Please be aware that some or all of the information provided during the application process may be made public. For question about the collection or management of personal information, contact the City's Privacy Officer at APO@lethbridge.ca or by phoning 311 (or 403-320-3111 if outside of Lethbridge

Application No. DEV16503

Development Authority's Written Submission

For the Subdivision and
Development Appeal Board
Hearing on March 19, 2026

APPLICATION NO.

DEV16503

LOCATION

3 Mt Sundial Bay W

LAND USE DISTRICT

R-L Low Density Residential

APPELLANT

5Ps Construction Ltd.

APPLICANT / LANDOWNER

5Ps Construction Ltd. (Applicant)

Davide Orlandini (Landowner)

PROPOSED DEVELOPMENT

To construct a new Single Detached Dwelling with Secondary Suite.

Appendix A: Drawings

ADJACENT DEVELOPMENT

North

Single Detached Dwelling

South

Single Detached Dwelling

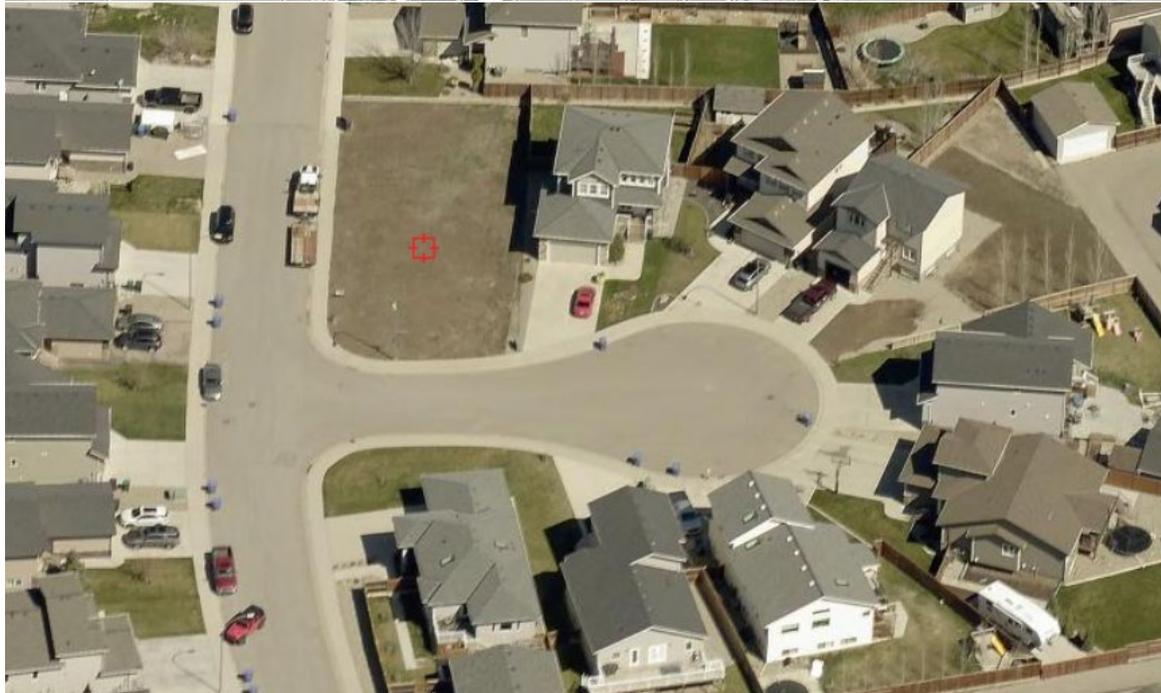
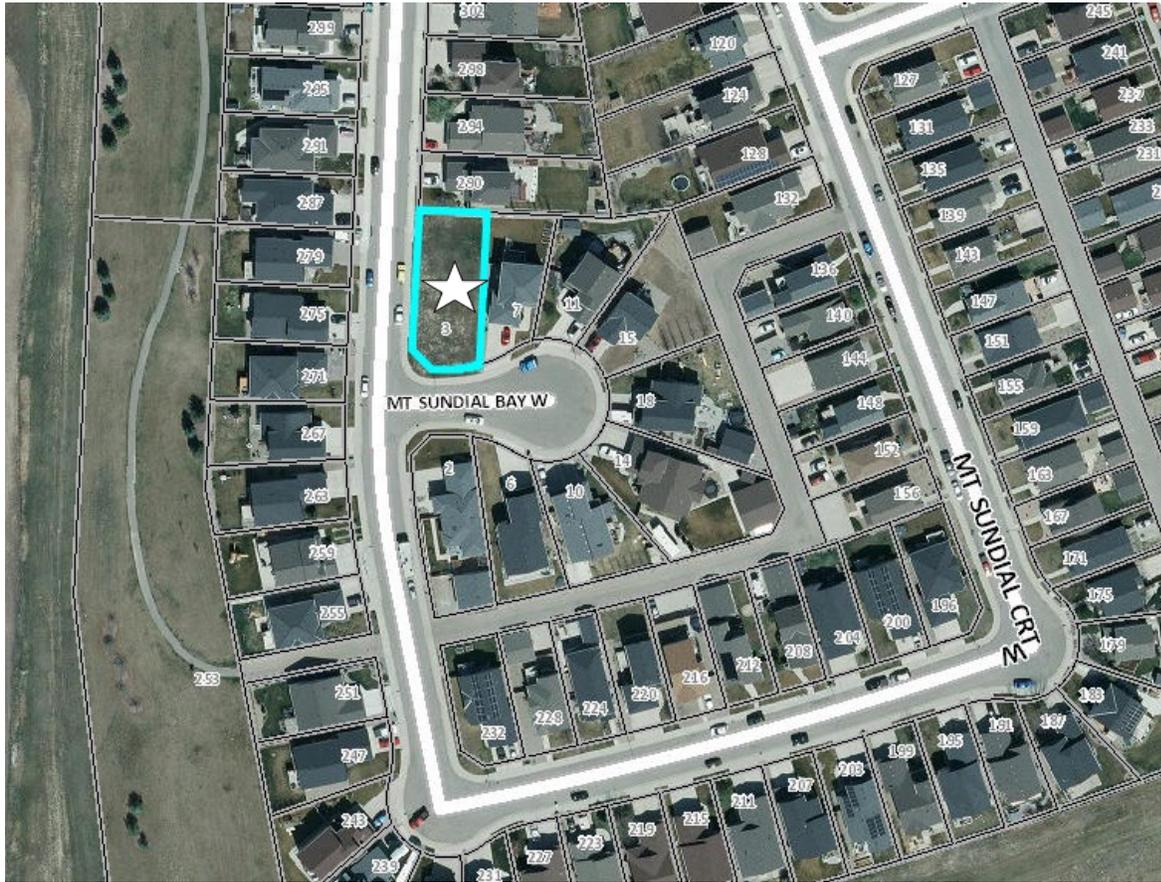
East

Single Detached Dwelling

West

Single Detached Dwelling

CONTEXT MAP



LAND USE BYLAW SUMMARY

Use: Single Detached Dwelling
Secondary Suite

Proposed Use	Permitted/Discretionary		
Single Detached Delling	Permitted		
Secondary Suite	Discretionary		
	Requirement	Proposed	Waiver Requested
Front (short) setback	6.0 m	6.1 m	N/A
Front (long) setback	3.0 m	4.83 m	N/A
Side setback	1.2 m	1.22 m & 12.84 m	N/A
Height	10.0 m	7.59 m	N/A
Parking	3	4 (tandem)	N/A

EVALUATION**Background**

- 2011 – City had determined the Sunridge subdivision had reached maximum density and that no further secondary suites shall be permitted. The Transportation system approved in the Outline Plan was based on the density of 710 dwelling units. The Transportation Department had determined that the road network could not absorb any further secondary suite development. Existing density is estimated at 818 dwelling units.
- Once it was determined over density had been reached, 20 secondary suites had been approved. It was determined that an additional 13 would be allowed for the developer to meet commitments to home builders.
- Any additional suite applications since then have either been denied, cancelled, or not applied for after discussion with Planning and Design staff.

- January 2024 – Current landowner contacted the City indicating interest in the subject property for the development of either a 2-unit dwelling or a single detached dwelling with secondary suite. It was indicated at that time that there were limitations within the Sunridge subdivision regarding the development of 2-unit dwellings or single detached dwellings with secondary suites.
- February 3, 2026 – Application to construct a new Single Detached Dwelling with Secondary Suite was received.
- The existing property is a vacant property. It is a corner parcel located in a cul-de-sac, with no lane access.
- The parcel is zoned Low Density Residential (R-L), in which Single Detached Dwellings are a permitted use and Secondary Suites are a discretionary use.
- The proposed drawings show a Single Detached Dwelling with a Secondary suite located in the basement. Parking is proposed to be within the front attached garage and driveway.
- There are no other approved secondary suites within the cul-de-sac.

Context

This Application is heard before the Appeal Board because:

- The applicant has submitted the appeal.

LEGISLATION & POLICY

Land Use Bylaw 6300

- Section 4 Definitions

Discretionary Use – means a Use of Land or Buildings in a District for which a Development Permit may be issued, with or without conditions, at the discretion of the Development Authority.

Permitted Use – means Use of land or Buildings in a District for which, unless exempted from requiring a Development Permit, a Development Permit must be issued with or without conditions, if the proposed Development conforms with this Bylaw.

Dwelling, Single Detached or Single Detached Dwelling means a Dwelling which contains not more than one Dwelling Unit which may be rented to a maximum of four (4) individuals. Manufactured Home/Tiny Home is a separate Use.

Dwelling Unit means one or more rooms operated or intended to be operated as a residence for a Household containing cooking, sleeping and sanitary facilities only for that unit.

Household means one or more persons living together and using the cooking facility of a Dwelling Unit.

Secondary Suite means a second self-contained Dwelling Unit located on a Parcel in which the Principal Use is a Single Detached Dwelling. A Secondary Suite may take the following forms:

House Suite: A suite incorporated into a Single Detached Dwelling and may be located in the Basement, on the main Storey or on an upper Storey or a combination thereof.

- Section 20(1) Decision Process for Permitted Uses
For a Development Permit application for a Permitted Use that is complete in accordance with Section 15:
 - (1) Not requiring a waiver of any provisions of this Bylaw, the Development Authority shall:
 - a. Issue a Development Permit with or without conditions.

- Section 21(2) Decision Process for Discretionary Uses
For an application for a Discretionary Use that is complete in accordance with Section 15 and upon which the Development Authority may decide:
 - (a) Not requiring a waiver of any provision of this Bylaw, the Development Authority shall:
 - i. issue a Development Permit with or without conditions, or
 - ii. refuse the application, giving the reason(s) for refusal.

- Section 82(5) Secondary Suite Requirements:
 - (a) One parking stall per Secondary Suite must be provided onsite,
 - (b) One Secondary Suite allowed per Parcel,
 - (c) The Secondary Suite must have a separate access either through an entryway from the exterior of the Dwelling or through a separate entrance within a common landing.
 - (d) The Secondary Suite shall not be subject to separation from the principal Dwelling through a condominium conversion.

- Section 86 (1) Purpose (R-L Low Density Residential)
Primarily for the Development of Single Detached Dwellings and compatible Uses.
- Section 86 (2)(c) Permitted Uses (R-L Low Density Residential)
Dwelling, Single Detached.
- Section 86 (3)(g) Discretionary Uses (R-L Low Density Residential)
Secondary Suites
- Section 86 (4) Density (R-L Low Density Residential)
For all R-L Districts identified in an Outline Plan approved on or after the date of this Bylaw:
Maximum 25 Dwelling Units/hectare

APPLICATION OF FACTS

- The outline plan for the Sunridge subdivision approved 710 dwelling units. Current number of approved dwelling units are 818, therefore the Sunridge subdivision has 108 more units than originally planning for under the Outline Plan.
- In 2011, it was determined that the Sunridge subdivision had been overdeveloped, and at that time noted that no further Secondary Suites were to be approved within that Subdivision.
- It was discussed with the current landowner 2 years prior to the application being made, that an application for a Secondary Suite would not be supported in the Sunridge Subdivision.
- Discretionary uses are not a guaranteed approval. They are reviewed to determine appropriateness for that location.

CONCLUSION

The application to construct a new Single Detached Dwelling with Secondary Suite, was refused for the following reasons:

1. The existing community of Sunridge is not in keeping with the density calculations of the Outline Plan. One additional unit will have a negative impact on the area which is already over density.

INFORMATIVE:

Sunridge Outline Plan allowed for 710 dwelling units. Existing units in the subdivision is now 818, therefore Sunridge has 108 more dwelling units than originally planned for in the Outline Plan.

SUBDIVISION AND DEVELOPMENT APPEAL BOARD

3 Mt Sundial Bay West
DEV16503

INTRODUCTION

Application No.:

DEV16503

Location:

3 Mt Sundial Bay

Land Use District:

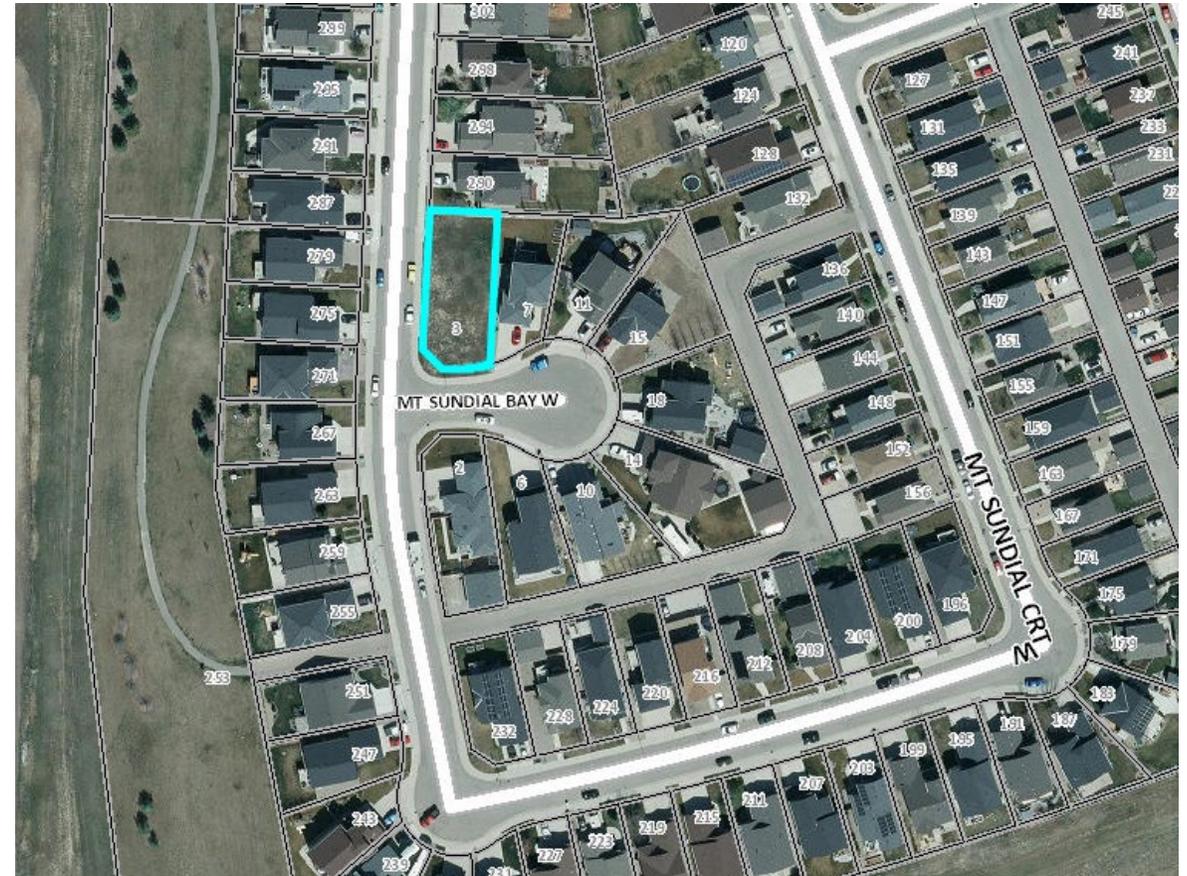
R-L Low Density Residential District

Current Development:

Vacant Parcel

Proposed Development:

To construct a new Single Detached Dwelling with Secondary Suite.



VISUAL CONTEXT



LAND USE BYLAW 6300

Definitions

Discretionary Use means a Use of Land or Buildings in a District for which a Development Permit may be issued, with or without conditions, at the discretion of the Development Authority.

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LAND USE BYLAW 6300

Definitions

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LAND USE BYLAW 6300

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- (1) Not requiring a waiver of any provisions of this Bylaw, the Development Authority shall:
 - (a) Issue a Development Permit with or without conditions.

Section 21(2) Decision Process for Discretionary Uses

For an application for a Discretionary Use that is complete in accordance with Section 15 and upon which the Development Authority may decide:

- (a) Not requiring a waiver of any provisions of this Bylaw, the Development Authority shall:
 - (i) issue a Development permit with or without conditions, or
 - (ii) refuse the application, giving the reason(s) for refusal.

EVALUATION SUMMARY

- The Outline Plan for Sunridge had approved the density to be 710 dwelling units. Existing density is estimated to be 818 dwelling units. Therefore over density by 108 dwelling units.
- In 2011, it was determined that the Sunridge subdivision had been overdeveloped, and at that time noted that no further Secondary Suites were to be approved within that Subdivision.
- January 2024 - the current landowner came in to discuss his interest in the property for the development of a 2-unit dwelling or secondary suite. At that time it was noted a Secondary Suite would not be supported in the Sunridge subdivision.
- February 2026 – an application was made to construct a new Single Detached Dwelling with Secondary Suite on the property.
- The parcel is zoned Low Density Residential (R-L), in which Single Detached Dwellings are a permitted use and Secondary Suites are a discretionary use.
- Discretionary uses are not a guaranteed approval. They are reviewed to determine their appropriateness for the property.

CONCLUSION

The application to construct a new Single Detached Dwelling with Secondary Suite, was refused for the following reasons:

1. The existing community of Sunridge is not in keeping with the density calculations of the Outline Plan. One additional unit will have a negative impact on the area which is already over density.

INFORMATIVE:

Sunridge Outline Plan allowed for 710 dwelling units. Existing units in the subdivision is now 818, therefore Sunridge has 108 more dwelling units than originally planned for in the Outline Plan.

APPEAL TO DEVELOPMENT PERMIT REFUSAL
3MT SUNDIAL BAY W, LETHBRIDGE
APPLICATION N. **DEV16503**

SDAB HEARING

Thursday, March 19, 2026 - 5:00 p.m.
Council Chambers, Main Floor, City Hall

Speaker: Nico Pasquotti
5P Custom Built Homes

Owner: Davide Orlandini
davideorlandini1978@gmail.com

THE REFUSAL

	Land Use Bylaw 6300 DEVELOPMENT PERMIT APPLICATION - REFUSED	APPLICATION NO. DEV16503
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Address: **3 MT SUNDIAL BAY W**
 Legal: 1012954;11;35

District: R-L

Applicant: 5P'S CONSTRUCTION
 Address: 380 COULEE CREEK CRT S LETHBRIDGE AB T1K 8C2

Phone: 403 382 0392

Development Proposed To construct a new Single Detached Dwelling with Secondary Suite.

District R-L LOW DENSITY RESIDENTIAL

Land Use DWELLING, SINGLE DETACHED - PERMITTED
 SECONDARY SUITE, NEW - DISCRETIONARY

REASONS FOR REFUSAL

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Decision Date

Feb 18, 2026

Development Authority



LEDA KOZAK TITTSWORTH

GROUND 1 – PLANNING GUIDELINES

(a) Outline Plan

Key Points:

- Outline Plan is **not** a binding bylaw (exceeded by **108 units**)
- Functions as a guideline, not a regulatory cap
- **No practical precedent set**, being the last undeveloped lot



GROUND 1 – PLANNING GUIDELINES

(b) “2011 Policy”

Key Points:

- Not a bylaw: still listed as **Discretionary**, not “Refused by default” (Prohibit in practice)
- 2024 contacts confirmed discretionary use, with limitations and risks of refusal
- Being Discretionary: evaluated **on its own merits**

GROUND 2 – CONSISTENCY

Key Points:

- City has approved many units beyond guidelines projection
- Discretionary is not Refused by default
- Consistency with previous approvals should be applied

GROUND 3 – PROPER COMPARISON

Key Points:

- Compare to **permitted Single Detached Dwelling (SDD)**, not to an empty lot
- Proposed design replicates typical SDD impact
- No additional burden vs permitted use
- 2024 City guidance taken seriously — Project specifically designed for **zero impact over a typical permitted SDD**

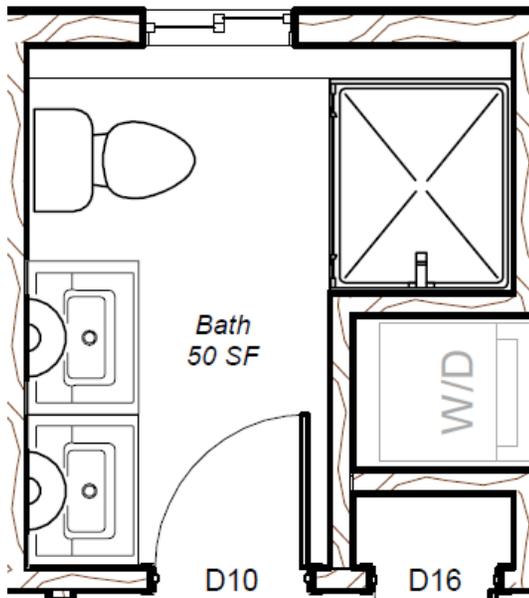
GROUND 4 – ALLEGED IMPACTS

(a) Sewer Infrastructure

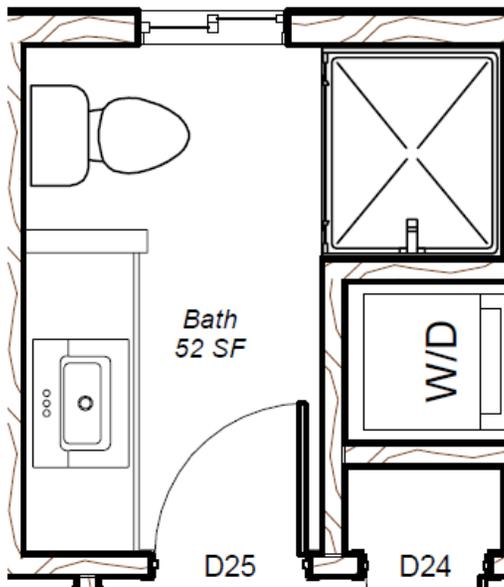
Key Points:

- 3 bathrooms total
- Same load as typical SDD
- **No measurable additional impact**

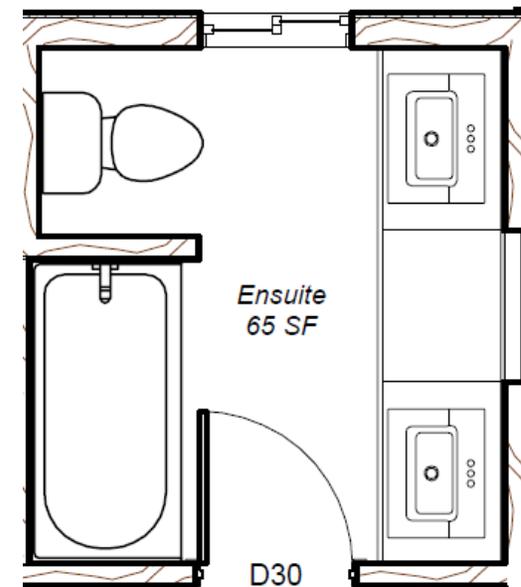
Basement bathroom



Main floor bathroom



Ensuite

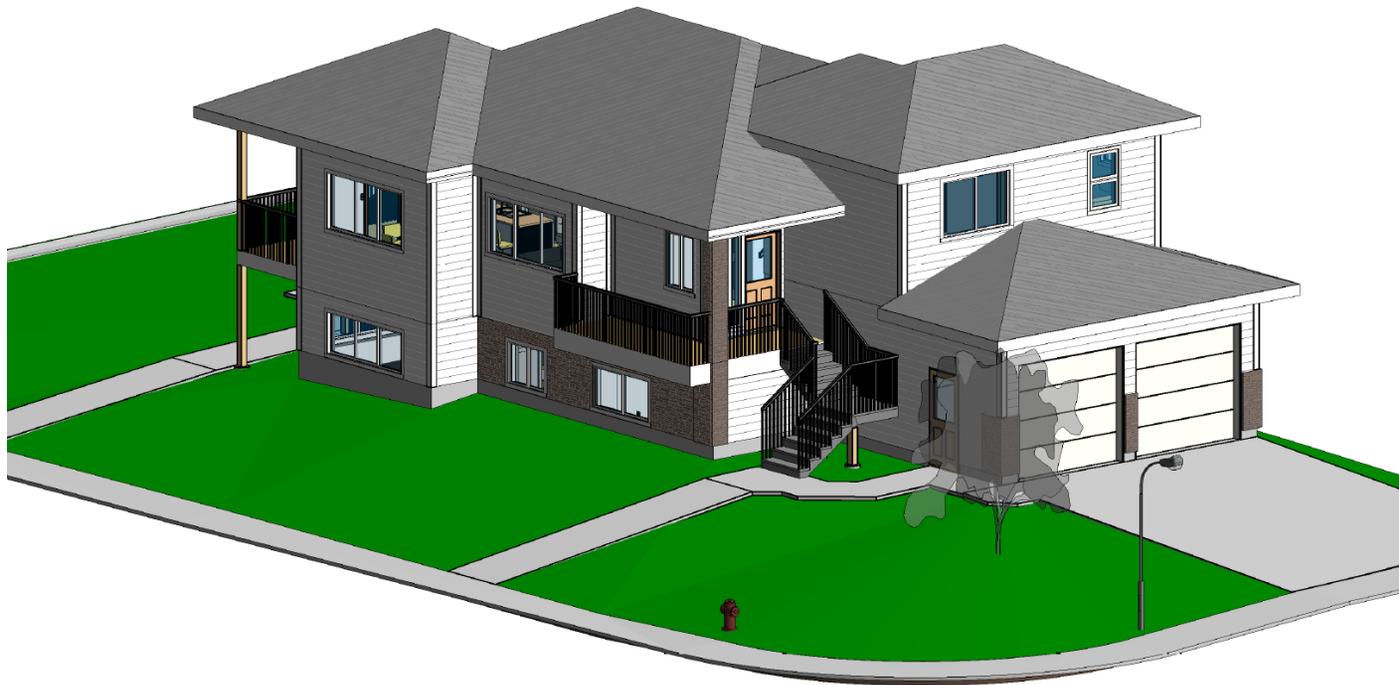


GROUND 4 – ALLEGED IMPACTS

(b) Architectural Impact

Key Points:

- Full compliance with **Architectural Controls**
- High-quality materials, well-articulated volumes and facades: not an investment “cookie-cutter” house
- **Enhances neighborhood character, quality and appeal**

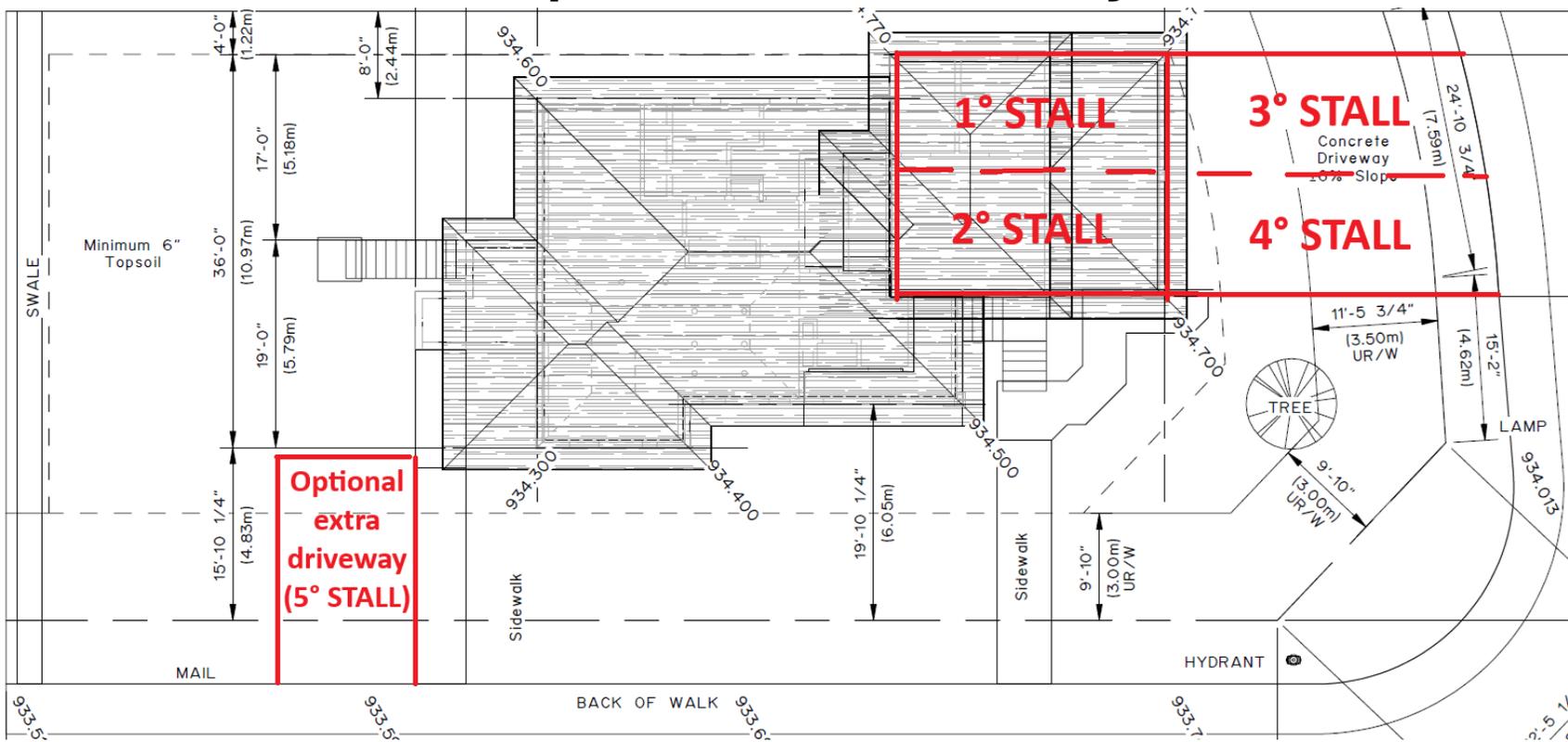


GROUND 4 – ALLEGED IMPACTS

(c) Parking & Traffic

Key Points:

- Already 4 off-street stalls (garage + driveway)
- 1 stall per bedroom
- **Corner lot → optional extra driveway**



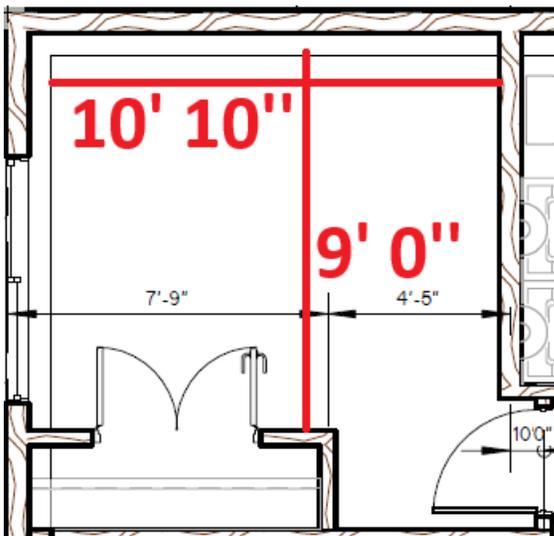
GROUND 4 – ALLEGED IMPACTS

(d) Residential Density

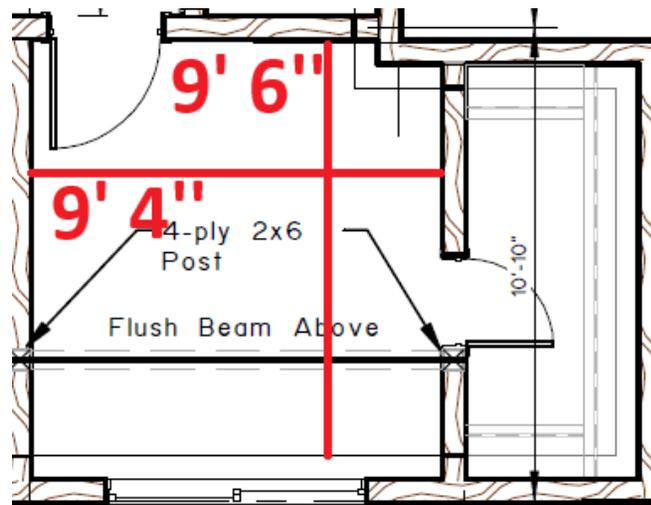
Key Points:

- 4 bedrooms total
- 3 small bedrooms → 1 person each
- **Max occupancy = 5 persons** (4 adults + 1 kid)
- **Comparable to typical Single Detached Dwelling**

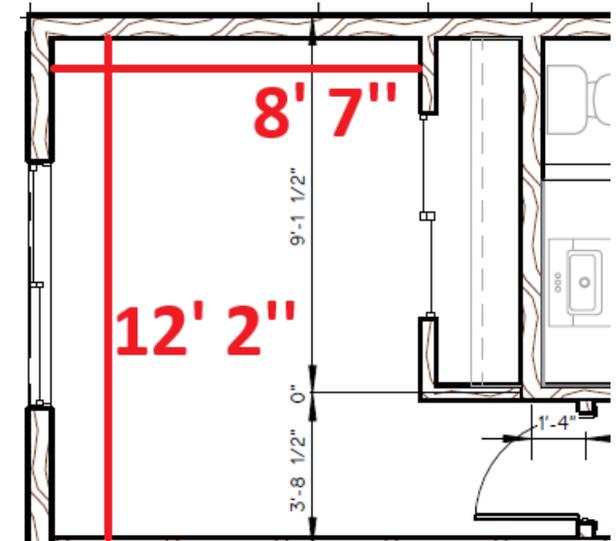
Bedroom 1, Basement



Bedroom 2, Basement



Bedroom 1, Main level



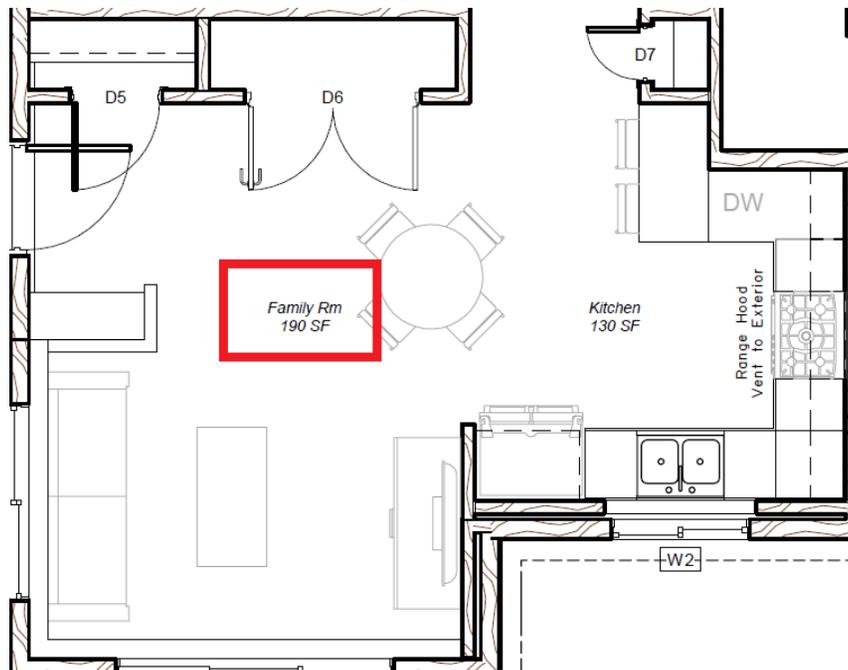
GROUND 4 – ALLEGED IMPACTS

(e) Noise Impact

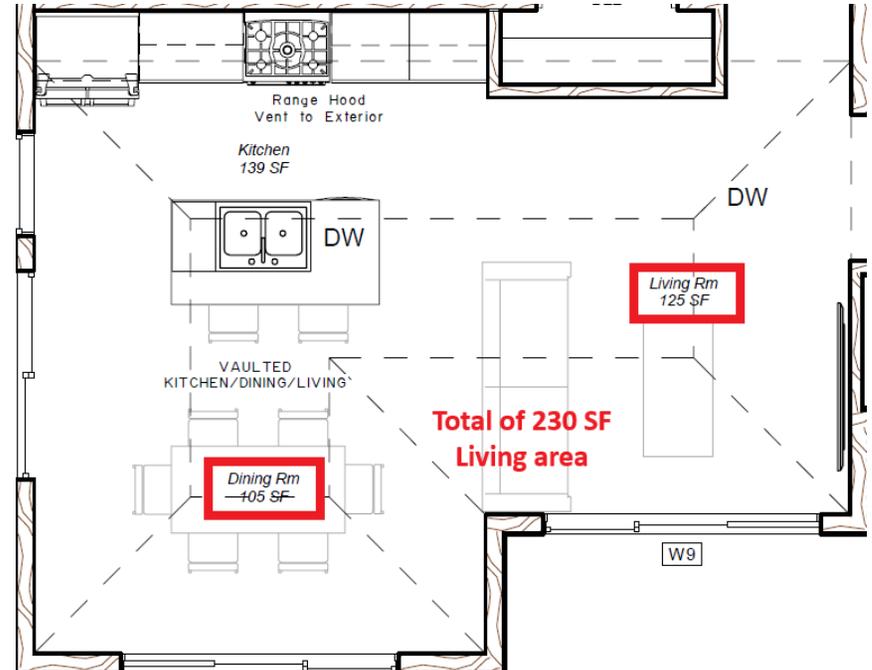
Key Points:

- Acoustic insulation between units
- Small living areas (190 + 230 sq ft)
- **Layout discourages gatherings**

Small living area in the Basement (190 SF)



Small living area in the main level (230 SF)



CONCLUSIONS

Key Points:

- Planning Guidelines are not binding bylaw
- Discretionary ≠ Refused by default. **Valuation on merits** is expected.
- **Not all secondary suite houses are the same**
- This project is:
 - modest in size, but high in quality
 - intended for low occupancy, suited for high-end, respectful, stable occupants
 - **meant to elevate the neighborhood's architectural value and appeal**
- **Impact equivalent to a typical (permitted) SDD**